

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of Numbering Resource Optimization)	CC Docket No. 99-200
National Thousands-Block Number Pooling)	
Rollout Schedule)	DA 01-2419

**Comments of the
Public Service Commission of Wisconsin**

The Public Service Commission of Wisconsin (PSCW) respectfully requests that the Federal Communications Commission (FCC) modify the thousands-block number pooling rollout schedule for Wisconsin. Based on forecasted area code exhaust estimates, the PSCW supports a revised schedule for when certain Wisconsin area codes are scheduled for the number-pooling rollout. The FCC Common Carrier Bureau requested comments on the proposed rollout schedule by Public Notices released on October 17, 2001. State requests to alter the proposed schedule are due by November 6, 2001.

The Issue - The Pooling Rollout Schedule for Wisconsin

In its March 31, 2000, *Report and Order and Further Notice of Proposed Rulemaking* in CC Docket No. 99-200 (the *Numbering Resource Optimization Docket*), the FCC determined that implementation of thousands-block number pooling is essential to extending the life of the North American Numbering Plan (NANP). By pooling numbers and assigning new telephone numbers in blocks of 1,000 numbers rather than 10,000 numbers, the exhaust of area codes is postponed and the entire NANP therefore will remain viable for many more years.

To implement thousands-block pooling, the FCC requested that the National Thousands-Block Number Pooling Administrator, NeuStar, develop a rollout schedule for the

implementation of pooling in various numbering plan areas (NPAs)¹ throughout the country.

A rollout schedule was determined to be necessary given the resources needed to effectuate pooling in every NPA and the recognition that a flash-cut across the country was not feasible.

The NeuStar proposed schedule for pooling rollout was included with the FCC Notice inviting these comments.

In the proposed rollout, number pooling will be established in several NPAs every quarter commencing in March 2002. The schedule that was released is as follows for the five NPAs in Wisconsin:

<u>NPA</u>	<u>MSA (Metropolitan Statistical Area)</u>	<u>Rollout Schedule</u>
414	Milwaukee-Waukesha	2 nd Quarter
262	Milwaukee-Waukesha	5 th Quarter
920	Green Bay	6 th Quarter
715	Minneapolis - St. Paul	6 th Quarter
608	Madison	7 th Quarter

The FCC Notice invites states to recommend the substitution of NPAs in the schedule (as long as the substitute NPA is one of the top 100 MSAs and has an expected life span of at least one year). The PSCW suggests that the schedule be modified given the current forecasts of area code lives in Wisconsin.

Recent information from NeuStar indicates the following:

<u>NPA</u>	<u>Forecasted Exhaust Date</u>
262	2004 3Q
414	2010 1Q
608	2006 3Q
715	2005 2Q
920	2004 4Q

¹ NPA and area code are synonymous terms.

The rollout schedule that NeuStar has proposed looks to accommodate the introduction of thousands-block pooling in all these Wisconsin NPAs before currently forecasted exhaust dates. However, as is apparent to all in the telecommunications industry, these area code life estimates are fluid, and anticipating that a specific forecasted date will hold to the currently shown date is dangerous. Further, the sooner number pooling is introduced, the earlier the benefits of this number conservation effort become available. In addition, in Wisconsin, NeuStar has already been working with the telecommunications providers to address the potential need for area code relief in the 262 and 920 areas.

Given these circumstances, the PSCW respectfully and urgently suggests that the 262 NPA be moved to the 2nd Quarter slot now assigned to the 414 NPA. Both these NPAs are in the same MSA (in the top 100) and both have a life of greater than one year. However, all current indications are that the 262 NPA faces greater demand for telephone numbers than does the 414 NPA.

The PSCW would further suggest that the 920 NPA be moved ahead of the 414 NPA in the pooling schedule. Though not in the top 100 MSAs, the 920 NPA is a fast growing area of the state, particularly from a telecommunications demand perspective.²

Conclusion

The PSCW requests the substitution of the 262 NPA into the 2nd Quarter rollout position in lieu of the 414 NPA in the thousands-block number pooling schedule for

² Strictly on an NPA exhaust perspective, there is arguably reason to consider moving the rollout for 715 and 608 NPA pooling ahead of the 414 NPA also. The current pooling schedule, however, does anticipate the rollout well ahead of the currently forecast area code exhausts for these area codes.

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Wisconsin. The PSCW also asks consideration of moving the number-pooling rollout of the 920 NPA ahead of the 414 NPA.

Dated at Madison, Wisconsin, November 6, 2001

By the Commission:

Lynda L. Dorr

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Secretary to the Commission

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